

## **Worksheet**

### **Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)**

U.S. Department of the Interior  
Bureau of Land Management (BLM)  
Turbo NEPA Number: AZ-420-2005-003

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**Note:** This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum titled “Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy” transmitting this worksheet and the “Guidelines for Using the DNA Worksheet” located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM’s internal analysis process and does not constitute an appealable decision.)

**A. BLM Office:** Tucson Field Office

**Lease/Serial/Case File No.** AZA 32945

**Proposed Action Title/Type:** Perpetual access of an existing road with infrastructure developments and maintenance of culverts, low water crossings, ditches, road signage, and permanent stadium lighting.

**Location of Proposed Action:** Within the 60 foot strip along the U.S./Mexico international boundary located in: T. 24 S., R. 25 E.,  
sec. 20, lot 4;  
sec. 22, lots 1 and 2;  
sec. 23, lots 1 thru 4  
sec. 24, lots 1 thru 4.  
Gila and Salt River Meridian, Arizona  
Cochise County, Arizona.

**Description of the Proposed Action:**

The proposed action is to develop and maintain physical infrastructures that are critical for the need and use for the operations of the U. S. Customs and Border Protection (CBP) of the Department of Homeland Security along the U.S.-Mexico border for controlling illegal border activities. The proposed infrastructures consist of the construction of low water crossings and ditches, installation of culverts, the maintenance and improvements to existing roads for all weather use to facilitate 2-way vehicular traffic, traffic and road condition signage, primary pedestrian fences and the installation of permanent stadium lighting structures.

See exhibits within the existing EA that locate and identify the proposed infrastructures:

Section 2: Stadium lighting, Figure 2-1h, panel X;

Roads, fencing, and Drainage structures, Figure 2-2c, panels L-M; Figure 2-3, 2-5, and 2-6. And Figure 2-2, entire project corridor.

**Applicant (if any):** U.S. Army Corps of Engineers, c/o U.S. Border Patrol of the Department of Homeland Security.

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate**

## Implementation Plans

LUP Name\* Safford District Resource Management Plan, Date Approved: August 1991 and approved in the Partial Record of Decision dated July 1994

Other document\*\* \_\_\_\_\_ Date Approved

\*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

\*\*List applicable activity, project, management, water quality restoration, or program plans.

☐ The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

XX☐ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:

Page 22, of the Safford RMP states under Land Use Authorizations, Rights-of-way, leases and permits will be considered on a case by case basis, in accordance with the decisions of this Resource Management Plan.

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### **C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action:

Final Supplemental Environmental Assessment for Infrastructure within U.S. Border Patrol Naco-Douglas Corridor Cochise County, Arizona, prepared for and by the U.S. Department of Homeland Security, dated November 2003.

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List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report). None

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### **D. NEPA Adequacy Criteria**

#### **1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Yes.**

Documentation of answer and explanation: The current proposed action is identified and analyzed in the referred EA document under Sections 1.0, and addressed in Section 2.0 Alternatives for the development and maintenance of roads, light poles, fencing and drainage structures.

#### **2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests,**

**resource values, and circumstances? Yes.**

Documentation of answer and explanation: The existing EA does address and analyze the range of alternatives and addresses the current environmental concerns, interest, resource values, and circumstances. There are 3 alternatives offered under the EA of No Action, Preferred and Full Build Out. See Section 2.0, Alternatives.

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action? Yes**

Documentation of answer and explanation: The existing EA's analysis and its Appendices are found to be adequate and current in its analysis of resource value, there is no new information or circumstances of resource values beyond the analysis.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes**

Documentation of answer and explanation: The methodology and analytical approach used in the existing EA is appropriate, adequate and meets BLM's NEPA standards. The existing EA and its Appendices support its methodology, analytical approaches and data collected for this project.

**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action? Yes.**

Documentation of answer and explanation: The existing EA does sufficiently analyze the site specific direct and indirect impacts related to the current proposed action and are unchanged from those identified in the existing EA. See Section 4.0, Environmental Consequences.

**6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)? Yes**

Documentation of answer and explanation: The cumulative impacts for the existing EA and the proposed action are unchanged from those analyzed in the existing EA. See Sections 3.0, 4.0 and Appendix D.

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? Yes.**

Documentation of answer and explanation: The public and interagency reviews and involvements are adequate for the current proposed action and are noted under Section 6.0, and Appendix E of the existing EA. The proponent will continue to consult and coordinate with other agencies as needed during the construction of the project. See Section 5.0 Mitigation.

**E. Mitigation Measures:** List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

The existing EA contains adequate Mitigation measures under Section 5.0, and they will be incorporated into the Right-of-Way Grant along with BLM's standard stipulations.

BLM stipulations:

1. Upon the discovery of any cultural artifacts during the course of construction or maintenance the holder will cease all construction operations and notify the Tucson BLM office immediately. Construction operations can continue only upon BLM's approval and when proper mitigation measures have occurred to protect the cultural discoveries.
2. The user shall avoid damaging and impeding the existing operations and facilities of El Paso Gas in sections 20 & 21, BLM ROW PHX 069683; and of the existing Cochise County road locate in sections 20, 21 & 22, BLM ROW AZA 19983. The holder shall coordinate with El Paso Gas and Cochise County on work occurring near their areas and to obtain permission to enter their ROW areas.
3. The BLM retains the right to occupy and use the right-of-way, and the right to issue or grant rights-of-way or other land uses upon, over, under and through the lands, and the ultimate right to convey ownership of the land, provided that the occupancy, use, or conveyance will not unreasonably interfere with the rights granted here.

## **CONCLUSION**

- ☐ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

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Shela A. McFarlin, Field Manager

Date \_\_\_\_\_